

### **REMARKS**

Claims 1-27 are pending in this application. Claims 1 and 27 have been amended.

Claims 1-27 were rejected under 35 USC §112, first paragraph, as being based on a disclosure which is not enabling. The Examiner stated that the claimed pixel growth curve, critical or essential to the practice of the invention, but not included in the claims is not enabled by the disclosure. The Examiner further cited Figure 1 of the specification for not enabling the claim element “defining the pixel growth curve, such that a plurality of consecutively filled pixels form a cluster along the curve and such that pixels widely separated along the curve are also widely separated within the halftone cell.”

Figure 1 of the specification illustrates a typical spiral growth pattern in a cluster dot. Figure 1 does not illustrate the method of Claim 1. Figure 6 illustrates the distribution of colors along a space filling curve. As noted in the specification at paragraph [0026]:

In order to provide multi-color, dot-off-dot halftoning, a filling curve with the property that consecutively filled pixels form a cluster, no matter from where along the curve that sequence of pixels is chosen. To minimize the registration problems the filling curve has the property that pixels widely separated along the curve are also generally widely separated spatially within the cell. Space-filling curves such as the Hilbert curve have these properties. The larger the cell, the more these properties are apparent. Figure 6 illustrates the distribution of three colors along a space filling curve (shown by the arrows). Threshold values for the first color (typically black) are filled in at the entry point of the curve. These are followed by four uncolored pixels. Then threshold values for the second color are filled in (e.g., cyan). These are followed by three uncolored pixels. Then the threshold values for the third color (e.g., magenta) are filled in along the curve.

Referring to Figure 6, it should be noted that three pixel clusters are shown: a cluster of black pixels (starting at the entry point of the curve), a cluster of cyan pixels (starting after the four uncolored pixels) and a cluster of magenta pixels (starting after the three uncolored pixels). For exemplary purposes, number the black pixels sequentially along the curve from 1 to 7, the cyan pixels from 8 to 14 and the magenta pixels from 15 to 21. Note that in Figure 6, when compared to Figure 1, fewer pixels of different colors are adjacent to one another. For example, pixel 2 is adjacent to pixel 11, but pixel 2 is “generally widely spatially separated” from pixels 8, 9, 12, 13 and 14. Similarly, pixel 1

is adjacent to pixel 15, but “generally widely spatially separated” from pixels 16, 17, 18, 19, 20 and 21. Note also that pixels 7 and 8 are “generally widely spatially separated”, and so on. The nature of a space filling curve does not permit all “pixels widely separated along the curve are also generally widely separated spatially within the cell”. Applicant submits that the specification is enabling for Claims 1-27 as amended.

No additional fee is believed to be required for this amendment; however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.

Reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is requested to call the undersigned Attorney for Applicant, Jeannette Walder.

Respectfully submitted,

**/Jeannette M. Walder, Reg. #30,698/**

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